

Deidentified Cases of Potential Foreign Influence

A number of U.S. research institutions have received a letter from the National Institutes of Health noting foreign affiliations and funding that may not have been disclosed. We understand that many of these were identified by NIH reviewing publications and talent program websites and comparing what they found to Other Support and Progress reports for adequacy of disclosure. Below are 12 examples of cases from several institutions, all of which address affiliations and support from China. Common themes include the following:

- Affiliation with Chinese universities (10)
- Inadequate reporting of a Foreign Component (9)
- NIH funded publications that also indicate support from China (9)
- Foreign Talent Program involvement (5)
- Foreign grants (4)
- Animal studies (4)
- Foreign companies (1)

Institutional responses may include providing explanations or clarification on whether the information in the letters is accurate, whether faculty did disclose or why faculty may not have been required to report these relationships to NIH, and adjusting Progress Reports, Other Support and related documents as needed.

- Dr. A serves as Principal Investigator on two active NIH awards: #1 & #2. Dr. A also holds an affiliation at Y University in China. Dr. A was selected as a Foreign Expert for China's Thousand People Plan, which may have included a stipend from the Chinese government along with the position at Y University. Several of Dr. A's NIH-supported publications were also supported by foreign awards, suggesting a collaboration your University may have failed to fully disclose including Dr. A's affiliation with Y University and the foreign components of the awarded projects in applications and progress reports which designated Dr. A as the Principal Investigator or Key personnel.
- Dr. B serves as Principal Investigator on one active NIH award, #1. Dr. B also holds one or more affiliations at Z University in China. At least two National Science Foundation of China grants, and one Municipal Science and Technology Commission grant are associated with Dr. B. Several of Dr. B's NIH-supported publications were also supported by foreign awards, suggesting a collaboration. Your University may have failed to fully disclose Dr. B's affiliation with Z University, his support from the National Science Foundation of China and the Municipal Science and Technology Commission, and the foreign components of the awarded projects in applications and progress reports which designated Dr. B as the Principal Investigator or Key personnel.
- Dr. AA serves as PI on three active NIH awards: #1, #2, #3. Dr. AA also holds an affiliation at YY University in China. Based on his citing of this affiliation in research publications, he has held this position since at least 201X. At least two foreign grants are associated with Dr. AA: the National Science Foundation of China Grant #1 and the Major International Joint Research Program Fund of China grant #2. Dr. AA's NIH-supported publications were also supported by foreign awards, suggesting a collaboration. The University failed to disclose Dr. AA's affiliation with YY University, his foreign grant support, and the foreign components of the awarded projects in applications and progress reports which designated Dr. AA as the Principal Investigator.

- Dr. BB serves as PI on the active NIH award #1. Dr. BB may be a recipient of the 201X Young Thousand Talents Plan, which may have included a stipend from the Chinese government along with a position at ZZ University in China. The University may have failed to disclose Dr. BB's funding from the Young Thousand Talent Plan and affiliation with ZZ University in applications which designated Dr. BB as the Principal Investigator.
- Dr. G, Professor of xxx at the University H, serves as PI on several active NIH awards. Dr. G also holds an affiliation at Chinese University X. Several of Dr. G's NIH-supported publications were also supported by foreign awards, suggesting foreign collaborations. University H may have failed to completely disclose Dr. G's affiliation at Chinese University X and foreign components of the awarded projects in applications and progress reports which designate Dr. G as the PI or Key Personnel.
- Dr. X, Professor of Y at the University of Z, serves as PI on one active NIH award. Dr. X also holds an affiliation at XXX University in China and was selected for the 20XX Chinese Talents Program, which may have included a stipend from the Chinese government. At least [here a list of several grants from Chinese institutions are listed] are associated with Dr. X. Several of Dr. X's NIH-supported publications were also supported by foreign awards, suggesting foreign collaborations. University Z may have failed to completely disclose Dr. X's affiliation at XXX University in China, funding from the Chinese Talents Program and other foreign bodies, and foreign components of the awarded projects in applications and progress reports which designate Dr. X as the PI or Key Personnel.
- Dr. A, Professor of xxx at the University of B, serves as PI on two NIH awards. Dr. A founded the Company X and Company Y, both located in the U.S. Dr. A recently disclosed to the NIH funding from Company Y in China to his U.S. lab for a project named "xxxx." Company Y was founded by Dr. A in 20xx The University may have failed to completely disclose Dr. A's affiliation with these companies and foreign funding in applications and progress reports which designate Dr. A as the PI or Key Personnel.
- Dr. A serves as Principal Investigator on one active NIH award. Dr. A may be a recipient of the Young Thousand Talents Plan, which includes a stipend from the Chinese government along with an affiliation at XYZ University in China. Your University may have failed to disclose Dr. A's funding from the Young Thousand Talents Plan and affiliation with XYZ University in applications and progress reports which designated Dr. A as the Principal Investigator.
- Dr. B serves as Principal Investigator on two active NIH awards. Dr. B also holds affiliations at DCE University in China, which have been disclosed in recent applications to the NIH. Dr. B also holds affiliations at the following Chinese institutions - FGH Laboratory; MPO Hospital; and RST Institute. Several of Dr. B's NIH-supported publications include animal studies conducted overseas, plus outside awards, suggesting foreign components. Your University may have failed to completely disclose Dr. B's affiliations at four Chinese institutions and foreign components of the awarded projects in applications and progress reports which designated Dr. B as the Principal Investigator.
- Dr. C serves as Principal Investigator on five active NIH awards. Dr. C also holds affiliations at K University; L University; M University; N Institute at P University; and the O Laboratory of X

Academy all of which are in China. Many of these affiliations were disclosed in recent applications to the NIH. Dr. C may be a recipient of the Chinese Academy of Sciences Hundred Talents Program and may have received funding support from three Chinese grant agencies. Several of Dr. C's NIH-supported publications include animal studies conducted overseas, plus outside awards, suggesting foreign components. Your University may have failed to completely disclose Dr. C's affiliations at foreign institutions, outside support, and foreign components of the awarded projects in applications and progress reports which designated Dr. C as the Principal Investigator.

- Dr. D serves as Principal Investigator on two active NIH awards. Dr. D also holds an affiliation with G Hospital, H University in China. Several of Dr. D's NIH-supported publications include animal studies conducted overseas, plus outside awards, suggesting foreign components. Your University may have failed to disclose Dr. D's affiliation with G Hospital, H University and foreign components of the awarded projects in applications and progress reports which designated Dr. D as the Principal Investigator.
- Dr. C serves as Principal Investigator on two active NIH awards: #1 and #2. Dr. C also holds an affiliation at X University in China. Several of Dr. C's NIH-supported publications were also supported by foreign awards, suggesting a collaboration. In addition, many of these studies involve animal research carried out at the Chinese institution, which may indicate a foreign component. Your University may have failed to fully disclose Dr. C's affiliation at X University, foreign support, and the foreign components of the awarded projects in applications and progress reports which designated Dr. C as the Principal Investigator or key personnel.

Actions Planned or Initiated

- Provide individual training on the obligation to disclose other support and foreign components
- Adjust Progress Reports, Biosketches, and Other Support
- Assess appropriate enhancements to the University's disclosure procedures to ensure that faculty and research administrators are educated on NIH grant requirements regarding support from entities based outside of the U.S.
- Revise help guides, business processes, and outside interest disclosure form to better identify the need for faculty to disclose outside relationships with foreign entities.